COMMONWEALTH OF MASSACHUSETTS Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE SECOND SET OF INFORMATION REQUESTS FROM THE BAY STATE GAS COMPANY DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-31 Has Mr. Cavallo specifically developed protective coating specifications for bare and unprotected coated *steel natural gas distribution mains & services installed between 1920 and 1970.* If the answer is yes, what U.S. natural gas distribution or transmission companies he has specifically done this for?

Response: No, Mr. Cavallo has not "specifically developed protective coating specifications for bare and unprotected coated steel natural gas distribution mains & services installed between 1920 and 1970."

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